

Mackenzie Valley Land and Water Board
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FILE NUMBER: MV2002L2-0019

Date: May 20, 2015
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From: Elaine for Julian Morse, Regulatory Officer

Number of pages including cover 15

Remarks:

Request for review and comment on the Request to
remove townsite Building submitted by north
American Tungsten Corporation Ltd. (NATCL)

** Plan is attached

- ☐ Enclosures
☐ As requested
☒ For your information
☒ For your comment
☐ For your approval

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MVLWB Registry

From: ORS Administrator <lwbors@yk.com>
Sent: Friday, May 15, 2015 3:45 PM
To: Undisclosed Recipients
Cc: lindsey@mvlwb.com; jmorse@mvlwb.com; tyree@mvlwb.com; jpotten@mvlwb.com; enviro@natcl.ca; dflemming@natcl.ca
Subject: Request for Comments on MVLWB Item - North American Tungsten Corporation Ltd. - Modification - Townsite Building Removal (MV2002L2-0019)

The Mackenzie Valley Land and Water Board invites reviewers to submit comments on **North American Tungsten Corporation Ltd. - Modification - Townsite Building Removal (MV2002L2-0019)** via the LWB Online Review System.

- To access **North American Tungsten Corporation Ltd. - Modification - Townsite Building Removal (MV2002L2-0019)**, please follow this link: [LWB Online Review System](#).
- The deadline for reviewers to submit comments is May 28 at 9:59pm Mountain Time.
- The deadline for the proponent to submit responses is Jun 03 at 9:59pm Mountain Time.
- The User Manual for the LWB Online Review System is available [here](#).

This request is being distributed by email only. If you require materials to be mailed or faxed, or require other assistance, please contact the Mackenzie Valley Land and Water Board.

- Jen Potten: 867-766-7468 jpotten@mvlwb.com
- Julian Morse: 867-766-7453 jmorse@mvlwb.com
- Lindsey Cymbalisty: 867-766-7471 lindsey@mvlwb.com
- Tyree Mullaney: 867-766-7464 tyree@mvlwb.com

Please sign in to update your notification preferences and note that this is a system generated email, so any feedback should be directed to permits@mvlwb.com.

Sent by Email

May 11, 2015

Mackenzie Valley Land and Water Board,
7th Floor, 4922 48th St. PO Box 2130
Yellowknife, NT X1A 2P6
permits@mvlwb.com
jmorse@mvlwb.com

Attention: Mr. Julian Morse, Regulatory Officer

Re: Water License MV2002L2-0019 – Modification Request; Town Site Building Removal

As per requirement of Water License MV2002L2-0019 Part G, Item 1, North American Tungsten Corporation is submitting modification request to remove specific buildings within the old Town site at Cantung.

The recently submitted Interim Closure and Reclamation Plan (ICRP) laid out the approved objectives and options for the reclamation of the Town site. This request is to carry out the removal / demolition of specific buildings documented in the ICRP, namely, 14 single family houses, a townhouse complex, and the elementary school. NATCL wishes to commence this work soonest. Carrying out the removal of these buildings will provide for sufficient pre-construction preparation of TSF7. The remainder of the Town site buildings identified in the ICRP will be removed at a later date.

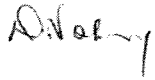
As the ICRP indicates, a significant amount of testing and research has gone into identifying potentially hazardous building materials and developing an appropriate disposal plan. Testing for asbestos and lead based paints has been extensive. Additional assessments have included potential PCB containing light ballasts, and mercury switches.

Attached are the work plans that addresses each potentially hazardous material, the demolition of the remaining structure, and the waste disposal method that has been selected and discussed with Regulators regarding the current best practices of all components. A site map with the locations identified is also provided. The Lead Paint Removal operating procedure and the Working with Asbestos procedure that reflects the current Health and Safety Standards in the NWT, which will be submitted to WSCC, are also attached.

The scarification of the paved road surfaces, the removal of the utilities, the sealing of the storm drains, also to be done during the summer of 2015. The soils in the town site are to be re-assessed, and remediation of hydrocarbon contaminated soil will occur in-situ over the summer 2015 season, being aerated weekly. Prior to foundation construction for TSF7, analysis of the in-situ treated soils will be conducted to determine whether the treatment was successful. Soils not meeting the criteria for industrial use will be excavated for further remediation, possibly at an off-site facility.

Please contact Deborah Flemming, Environmental Superintendent (dflemming@natcl.ca) or Cantung Environmental Department (cantungenviro@natcl.ca) should you have any questions or concerns regarding this information.

Yours truly,
North American Tungsten Corporation



David Vokey
Sr. Environmental Coordinator

Attachments: Area Map - Location of Buildings
Town Site Demolition Work Plan
SAF 010 - Working with Asbestos Procedures
SAF 011 - Lead Paint Removal Operating Procedures

CC: J. McKenzie, B. Delaney, A. Krasnick, G. Fuglsang, T. Howell, D. Flemming, Cantung Enviro, GNWT Inspector, Chief Mike Matou - NBDB

Town Site Demolition Work Plan

(14 Single Family Houses, a Townhouse Complex, and an Elementary School only)

The Projects department will review “as built” construction drawings to determine the locations of the services to each of the buildings to be demolished. They will confirm that domestic water services to the buildings to be demolished are permanently cut off from the rest of the water distribution system. The Electrical department will also ensure the electrical supply to each structure is rendered safe at the power source. They will disconnect and remove to the hazardous waste area, all electrical transformers. A contractor will remove all identified Lead Based Painted materials and store it appropriately in the Hazardous waste area pending off-site disposal at an approved facility. The contractor will remove any remaining oil tanks and oil line services to the buildings, and excavate and/or remediate in-situ any hydrocarbon contaminated soil identified. Areas where hydrocarbon contaminated soils exist will not be buried unless the lab results from samples collected verify that it meets criteria for an industrial site, and as approved by the Environmental department, and copies of the lab data submitted to regulatory agencies. Soils that cannot be remediated on-site will be excavated and shipped to an approved off-site disposal facility.

Following these steps external to the buildings; the contractor will enter each building and proceed to cut the sewer line within the basement where it exits, and plug the pipe with concrete. The water line entering each building will be capped within the basement. Additionally; the floor drains will be sealed with concrete, as will any other openings determined to exist within the basement, including windows and doors. A checklist will be completed for each building, verifying all openings have been sealed and no hydrocarbon contaminated soil exists.

The contractor will cordon off an area surrounding the building to be demolished and post warning signs. The Project Manager will review with the demolition team the condition and specifics as to how each particular building should be demolished and any special techniques needed to be employed in order to safely fall the building.

Using an excavator, an operator will wear appropriate PPE and check to confirm his 2 way radio is working and on the correct radio channel. Working in the manner in which was determined to be the best approach to bring down the building, he proceeds to topple it into its basement. Observing from a distance of approximately 20 m upwind, the remainder of the crew will watch for potential dangers while the excavator works, and advise the operator of these. Standing by with the crew will be a water truck c/w a pump and fire hose should an unforeseen situation occur, and/or spray down the surface of the building debris should it become excessively dusty. The ERT will be on standby should their services be required. The excavator operator will fold the building debris down into the basement and pulverize and compact it. Any debris that falls outside of the basement will be removed and placed inside with the help of the team if required.

Household fixtures such as bath tubs, toilets, shower stalls, bathroom sinks, kitchen sinks, range hoods, kitchen and bathroom cabinets, electric water heaters, and furnaces will be demolished and compacted with the rest of the building debris into the basements.

Materials that fall under the hazardous waste category such as asbestos containing materials (non-friable, transite exterior paneling, vinyl flooring) will also be pulverized and compacted within the basements. Gravel will be placed on top of the debris in the basement and compacted. A final capping of the basements will involve encasing it in concrete shotcrete, thereby encasing all the debris within a sealed concrete block. The basements to be buried will have their corners surveyed and the information provided on a drawing. Signs will be erected indicating that the area contains asbestos materials.

All asphalt and concrete surfaces on Main Street will be broken up and compacted within the foundation of the dry stack tailings facility for this area.



NORTH AMERICAN TUNGSTEN

C O R P O R A T I O N L T D

Cantung Mine

Control
number

SAF 011

✓	Classification	Reviewed By		
	- Policy	General Manager	Safety	OH&S
	- Procedure	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>
	- Work instruction	Department Heads		
	- Form	<i>[Signature]</i> T. HOWELL		
	- Other (describe):			

Lead Paint Removal (town site reclamation)

Revision number	Date of revision	Date of 1 st issue April 4, 2015
Originating department	Prepared by Tom Cheveldave Title Safety Superintendent	Approved by Title
Distribution Site Wide	Page 1 of 3	

Objective:

To safely demolish town site buildings containing lead paint while ensuring protection of workers, minimization of the release of dust from lead paint, adequate clean up and decontamination.

Scope:

This procedure outlines the safe handling of material containing lead paint and ensures the safety of workers, contractors and visitors at Cantung Mine. To ensure the safety of all involved NATCL will follow the Environmental Guideline for Waste Lead paint.

Type of Material Containing Lead Paint:

- It has been determined that there is lead paint on the exterior doors, window and door trim and eave boards of the old town site houses.
- Samples of lead-based paint have been identified by the Environmental department. These samples were taken from various areas and sent off site for testing prior to demolition.

Training:

- WHMIS training
- The hazards of lead, including health effects and symptom recognition.
- Personal hygiene, respirator requirements, and work measures
- Use, cleaning and disposal of respirators and protective equipment

List of Equipment:

- Signs / Danger Tape
- 6 Mil poly to be used as drop sheets

- Waste disposal containers

PPE:

- All standard PPE which includes; hardhat, safety vest, glasses, safety toed boots,
- Impermeable gloves (nitrile)
- Disposable impermeable protective coveralls complete with hood and booties
- Hearing protection is to be used as required
- Half face mask respirator c/w P100 cartridges (all workers to be fit tested and have supporting documentation)

Hazards Identified and Control Measures:

- Proper footing when lifting or moving equipment.
- Ensure to avoid overstraining
- Proper housekeeping is important to avoid slips, trips, falls and contamination

Emergency Contact Information:

- Carry radio at all times and communicate with operator of excavator and others in the area. For emergency, call Channel #3 (Cantung Repeater). State your emergency, location and number of injured. Ensure you state that lead waste may be present so that appropriate equipment with emergency personnel is brought to area.

General Measures:

- Workers should not eat, drink, chew gum or smoke in the work area
- Workers should wash their hands before eating, drinking, smoking or leaving the project
- Drop sheets should be used below all lead operations which produce or may produce dust, chips, or debris containing lead
- Dust and waste should be cleaned up and removed by vacuuming with a HEPA filter equipped vacuum
- Clean-up after each operation should be done to prevent lead contamination and exposure to lead
- Compressed air or dry sweeping should not be used to clean up any lead-containing dust or waste from a work area or from clothing

Dust and waste should be cleaned up at regular intervals and placed in a container that is:

- Dust tight
- Identified as containing lead waste
- Cleaned with a damp cloth or a vacuum equipped with a HEPA filter immediately before being removed from the work area
- Removed from the workplace frequently and at regular intervals

Preparation:

- Workers using this procedure must have received instruction providing awareness of lead waste and the protective measures necessary for safety
- Before work begins, a documented JHA must be held to discuss this procedure and assess all risks along with hazards associated with job to be performed.
- Use hazard warning tape and signs to protect the work area from unauthorized access. Notify others in the area that work with lead waste is taking place.

Procedure:

- Secure area from unauthorized personnel with RED Danger tape. Clearly identify the words "Lead Waste" with signage so that no unauthorized persons are allowed near area.
- Lay down drop sheets on area where work will be performed.
- Workers will remove all lead-based paint material from structure.
- Workers will cut up pieces to manageable lengths.
- Put cut up pieces of lead-based paint material into "Mega Bags"
- Clearly identify house number and contents on outside of "Mega Bag"
- Seal bag
- Transfer and store bags in hazardous waste container as per instructions from Environmental department.

***Note* - Ensure that no persons are exposed while cutting process and activities are on-going.**

Clean up:

- Ensure all waste materials have been placed in waste disposal bags.
- Wet wipe any tools and equipment and place them off the drop sheet.
- Wet wipe PPE: gloves, boots, coveralls and outside of respirators
- Roll up drop sheets and place in waste disposal bag.
- Wet wipe all waste bags. Seal all waste bags except one (PPE).
- Remove coveralls, boot covers and gloves and place them in the waste bag.
- Wipe down respirator, remove it and dispose filter cartridges or seal intakes with duct tape. Dispose of wiping rag. Seal the last bag.
- Double bag all waste and seal with duct tape.
- Remove danger tape and warning signs.
- Any plastic bags used for waste must be clearly marked "Lead Waste" on bag.



**NORTH AMERICAN
TUNGSTEN**
CORPORATION LTD
Cantung Mine

Control
number

SAF 010

✓ Classification	Reviewed By		
- Policy	General Manager	Safety	OH&S
- Procedure	<i>[Signature]</i>	<i>[Signature]</i>	CM
- Work instruction	Department Heads For Tom CHEVELDAVE		
- Form			
- Other (describe):			

**Working with Asbestos
(town site reclamation)**

Revision number	Date of revision	Date of 1 st issue
Originating department Safety	Prepared by Tom Cheveldave Title Safety Superintendent	April 18, 2015
Distribution Site Wide		Approved by <i>[Signature]</i> For TOM CHEVELDAVE
		Page 1 of 4

Objective:

To safely demolish town site buildings containing asbestos material while ensuring protection of workers, minimization of the release of asbestos fibres, adequate clean up and decontamination.

Scope:

This procedure outlines the safe handling of material containing asbestos and ensures the safety of workers, contractors and visitors at Cantung Mine. To ensure that NWT Codes of Practice for the safe working with asbestos is followed.

Type of Material Containing Asbestos:

- It has been determined that there is asbestos containing material (ACM) inside the floor tile of the existing structures which are to be demolished.
- This asbestos is non-friable (not easily crumbled), if undamaged.
- Additionally, paneling containing asbestos has also been identified.
- While sawing and drilling can cause asbestos products to release asbestos fibers, transite and floor tile containing asbestos products are considered to be less dangerous than other asbestos materials. Transite hardens over time therefore it requires a great deal of force to become friable.
- This is a low risk asbestos procedure. Removal of asbestos will involve demolition of building. Floor tile along with paneling will be encased with debris from entire structure.

Pre-Planning:

Complete a WSCC "Asbestos Project Notification" (APN) and copy of written procedure at least five days prior to work being done. Form can be found at below path.

http://www.wsc.nt.ca/sites/default/files/documents/Asbestos%20Project%2020%20Notification%20Form%20ENGLISH_0.pdf

Training:

- All workers to be trained in asbestos abatement
- Above training to be documented

List of Equipment:

- Caterpillar 345C excavator
- Gillian personal air pump
- Sensidyne Cassette-Classic Style 25mm, PCM, 0.8um, MCE
- Town site water supply c/w water hose and nozzle
- Signs / Danger Tape
- Pail of water c/w rags for wiping
- 6 Mil poly to be used as drop sheets
- Duct tape
- Waste disposal bags

PPE:

- All standard PPE which includes; hardhat, safety vest, glasses, safety toed boots,
- Disposable gloves
- Disposable impermeable protective coveralls complete with hood
- Hearing protection is to be used as required
- Half face mask respirator c/w P100 cartridges (all workers to be fit tested and have supporting documentation)

Hazards Identified and Control Measures:

- Proper footing when lifting or moving equipment.
- Ensure to avoid overstraining
- Proper housekeeping is important to avoid slips, trips, falls and contamination

Emergency Contact Information:

- Carry radio at all times and communicate with operator of excavator and others in the area. For emergency, call Channel #3 (Cantung Repeater). State your emergency, location and number of injured. Ensure you state that Asbestos Containing Material may be present so that appropriate equipment with emergency personnel is brought to area.

Procedure:

- Workers using this procedure must have received instruction providing awareness of asbestos hazards and the protective measures necessary for safety
- Before work begins, a documented JHA must be held to discuss this procedure and assess all risks along with hazards associated with job to be performed.
- Use hazard warning tape and signs to protect the work area from unauthorized access. Notify others in the area that work with ACM is taking place.
- Secure area from unauthorized personnel with RED Danger tape. Clearly identify the words "ASBESTOS" with signage so that no unauthorized persons are allowed near area.
- Worker will water down building to ensure dust suppression. Worker operating water hose will ensure that he/she is upwind from structure and a safe distance from any dust.
- Caterpillar 345C excavator will be used to demolish structure. Operator to ensure that high efficiency cab air filter is working properly as part of pre-check. Excavator to be positioned upwind from structures.
- Work crew will ensure that all structure is put inside concrete foundation so that remediation process may begin.
- Structure must be wet down continually to ensure that release of asbestos fiber is minimized.

Air Monitoring:

- Asbestos air monitoring equipment is to be used before, during and after demolition work.
- Air is to be monitored before work to ensure baseline is established
- Air is to be monitored during demolition to ensure that any contamination with ACM is captured
- Air is to be monitored after work is done to ensure that there is no contamination of area.

Clean up:

- Ensure all waste materials have been placed in waste disposal bags.
- Wet wipe any tools and equipment and place them on the drop sheet.
- Wet wipe PPE: gloves, boots, coveralls and outside of respirators
- Wet wipe the plastic drop sheet, then remove it carefully, folding it inward. Roll tightly and place it in a waste disposal bag.
- Wet wipe all waste bags. Seal all waste bags except one (PPE).
- Remove coveralls, boot covers and gloves and place them in the waste bag.
- Wipe down respirator, remove it and dispose filter cartridges or seal intakes with duct tape. Dispose of wiping rag. Seal the last bag.
- Double bag all waste and seal with duct tape.

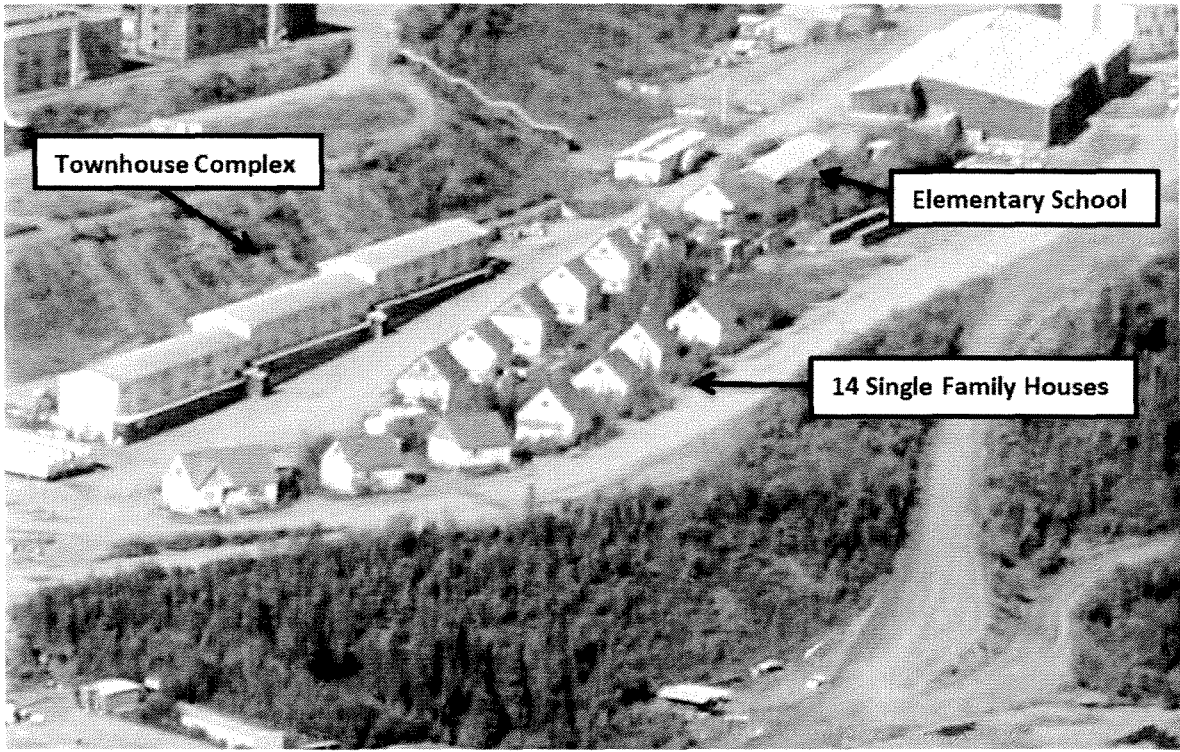
- Remove danger tape and warning signs.
- Any plastic bags used for waste must be clearly marked "ASBESTOS" on bag.

Sealing Asbestos Waste:

- All materials, including PPE, drop sheets, rags and sponges shall be put into a disposable bag labeled "**Carcinogenic – Do Not Inhale Dust**"
- Twist the top portion of the bag into a tail and seal with duct tape at the base of the tail.
- Take the leftover twisted tail section of the bag and bend it around to make a loop and attach it to the base of the tail using the duct tape. This seals the bag and makes a carrying handle.
- Place the first bag into the second bag and repeat the sealing procedure as necessary.
- All bags to be contained in yellow barrels labeled asbestos until permanent disposal is arranged.

Completion of Project:

- Inform WSCC when asbestos abatement work is complete
- Provide a list of workers involved in the work to WSCC
- Send WSCC a complete summary of air sample results



DEHCHO REGION DISTRIBUTION LIST

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Fort Simpson Métis Local #52	Marie Lafferty	President	(867)695-2040;
Hay River Metis Council	Wally Shuman	President	(867)874-4472; hrrmc@northwestel.net ;
[Liard First Nation if in asserted area]	Daniel Morris	Chief	(867)536-7910;
Northwest Territory Métis Nation	Garry Bailey c/o Tim Heron	NWTMN IMA Coordinator	(867)872-3586; rcc.nwtmn@northwestel.net ;
[Ross River Dena Council if in asserted area]	Brian Ladue	Chief	chiefladue@gmail.com ; (867)969-2405;

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Abbreviations:

HS: Host send	PL: Polled local	MP: Mailbox print	CP: Completed	TS: Terminated by system
HR: Host receive	PR: Polled remote	RP: Report	FA: Fail	G3: Group 3
WS: Waiting send	MS: Mailbox save	FF: Fax Forward	TU: Terminated by user	EC: Error Correct